

CLEARY GOTTlieb STEEN & HAMILTON LLP

ONE LIBERTY PLAZA
NEW YORK, NY 10006-1470

(212) 225-2000

FACSIMILE (212) 225-3999

WWW.CLEARYGOTTlieb.COM

WASHINGTON, DC • PARIS • BRUSSELS • LONDON • MOSCOW
FRANKFURT • COLOGNE • ROME • MILAN • HONG KONG
BEIJING • BUENOS AIRES • SÃO PAULO • ABU DHABI • SEOUL

Writer's Direct Dial: +1 212 225 2508
E-Mail: cboccuzzi@cgsh.com

LAURENT ALPERT
VICTOR I. LEWKOW
LESLIE N. SILVERMAN
ROBERT L. TORTORIELLO
LEE C. BUCHHEIT
JAMES M. PEASLEE
THOMAS J. MOLONEY
JONATHAN I. BLACKMAN
MICHAEL L. RYAN
ROBERT P. DAVIS
YARON Z. REICH
RICHARD S. LINCER
STEVEN G. HOROWITZ
JAMES A. DUNCAN
STEVEN M. LOEB
CRAIG B. BROD
MITCHELL A. LOWENTHAL
EDWARD J. ROSEN
LAWRENCE B. FRIEDMAN
NICOLAS GRABAR
CHRISTOPHER E. AUSTIN
SETH GROSSHANDLER
WILLIAM A. GROLL
HOWARD S. ZELBO
DAVID E. BRODSKY
ARTHUR H. KOHN
RICHARD J. COOPER
JEFFREY S. LEWIS
PAUL J. SHIM
STEVEN L. WILNER
ERIKA W. NIJENHUIS
LINDSEY P. GRANFIELD
ANDRES DE LA CRUZ
DAVID C. LOPEZ
CARMEN A. CORRALES
JAMES L. BROMLEY
MICHAEL A. GERSTENZANG
LEWIS J. UMAN
LEV L. DASSIN

NEIL O. WHORISKEY
JORGE U. JUANTORENA
MICHAEL D. WEINBERGER
DAVID LEINWAND
JEFFREY A. ROSENTHAL
ETHAN A. KLINGSBERG
MICHAEL J. VOLKOVITSCH
MICHAEL D. DAYAN
CARLINE D. BOCCUZZI, JR.
JEFFREY D. KAPFF
KIMBERLY BROWN BLACKLOW
ROBERT J. RAYMOND
LEONARD C. JACOBY
SANDRA L. FLOW
FRANCISCO L. CESTERO
FRANCESCA L. ODELL
WILLIAM L. MCRAE
JASON FACTOR
MARGARET S. PEONIS
LISA M. SCHWEITZER
JUAN G. GIRALDEZ
DUANE MCLAUGHLIN
BREON S. PEACE
MEREDITH E. KOTLER
CHANTAL E. KORDULA
BENET J. O'REILLY
DAVID AMAN
ADAM E. FLEISHER
SEAN A. ONEAL
GLENN P. MCGRORY
MATTHEW P. SALERNO
MICHAEL J. ALBANO
VICTOR L. HOU
ROGER A. COOPER
AMY R. SHAPIRO
JENNIFER KENNEDY PARK
ELIZABETH LENAS
LUKE A. BAREFOOT
PAMELA L. MARCOGLIESE

PAUL M. TIGER
JONATHAN S. KOLODNER
DANIEL ILAN
MEYER H. FEDIDA
ADRIAN R. LEIPISIC
ELIZABETH VICENS
ADAM BRENNEMAN
ARI MACKINNON
JAMES E. LANGSTON
RESIDENT PARTNERS
SANDRA M. ROCKS
S. DOUGLAS BORISKY
JUDITH KASSEL
DAVID E. WEBB
PENELope L. CHRISTOPHOU
BOAZ S. MORAG
MARY E. ALCOCK
DAVID H. HERRINGTON
HEIDE H. ILGENFRIITZ
HUGH C. CONROY, JR.
KATHLEEN M. EMBERGER
WALLACE L. LARSON, JR.
JAMES D. SKALL
AVRAM E. LUFT
ANDREW WEAVER
HELENA K. GRANNIS
GRANT M. BINDER
JOHN V. HARRISON
CAROLINE F. HAYDAY
DAVID FLECHNER
RESIDENT COUNSEL

LOUISE M. PARENT
OF COUNSEL

September 1, 2015

BY EMAIL AND ECF

Honorable Thomas P. Griesa
United States District Court for
the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *NML Capital, Ltd. v. Republic of Argentina*, No. 14 Civ. 8601;
NML Capital, Ltd. v. Republic of Argentina, No. 14 Civ. 8988.

Dear Judge Griesa:

We write in connection with the motion for specific performance (concerning the *pari passu* clause) filed by NML Capital, Ltd., dated August 14, 2015, and since August 14 joined by numerous plaintiffs in various actions. With the consent of plaintiffs, we inform the Court that the parties have agreed to the following briefing schedule:

- The Republic shall have until September 25, 2015, to serve responsive papers.
- Plaintiffs shall have until October 9, 2015, to serve reply papers.

It is our understanding, based on discussions with counsel for NML, that the plaintiffs have agreed that the foregoing schedule shall apply to all plaintiffs who file "me too" motions¹ on or before September 14, 2015, as well those already filed in the following actions (the "Motions"):

- *FFI Fund, Ltd. and FYI Ltd. v. Republic of Argentina*, No. 14 Civ. 8630;

¹ The parties agree that a "me too" motion is any motion that joins NML's Memorandum of Law and that makes no additional arguments. To the extent that a plaintiff files a motion for specific performance that includes arguments not otherwise found in NML's Memorandum of Law, the Republic will coordinate with that plaintiff on an appropriate briefing schedule.

Hon. Thomas P. Griesa, p. 2

- *EM Ltd. v. Republic of Argentina*, No. 14 Civ. 8303;
- *Perez, et al. v. Republic of Argentina*, No. 14 Civ. 8242;
- *Aurelius Capital Partners, LP and Aurelius Capital Master, Ltd., v. Republic of Argentina*, No. 14 Civ. 8946;
- *Blue Angel Capital I LLC v. Republic of Argentina*, No. 14 Civ. 8947;
- *Capital Ventures International v. Republic of Argentina*, No. 14 Civ. 7258;
- *Adami, et al. v. Republic of Argentina*, No. 14 Civ. 7739;
- *Capital Markets Financial Services Inc., et al. v. Republic of Argentina*, No. 15 Civ. 0710;
- *Foglia, et al. v. Republic of Argentina*, No. 14 Civ. 8243;
- *Pons, et al., v. Republic of Argentina*, No. 13 Civ. 8887;
- *Guibelalde, et al. v. Republic of Argentina*, No. 11 Civ. 4908;
- *Dorra, et al. v. Republic of Argentina*, No. 14 Civ. 10141;
- *Beloqui, et al. v. Republic of Argentina*, No. 14 Civ. 5963;
- *Tortus Capital Master Fund, LP v. Republic of Argentina*, Nos. 14 Civ. 1109, 14 Civ. 3127;
- *Trinity Investments Limited v. Republic of Argentina*, Nos. 14 Civ. 10016, 15 Civ. 1588, 15 Civ. 2611, 15 Civ. 5886;
- *Montreux Partners, L.P. v. Republic of Argentina*, No. 14 Civ. 7171;
- *Los Angeles Capital v. Republic of Argentina*, No. 14 Civ. 7169;
- *Cordoba Capital v. Republic of Argentina*, No. 14 Civ. 7164;
- *Wilton Capital, Ltd. v. Republic of Argentina*, No. 14 Civ. 7166;
- *MCHA Holdings, LLC v. Republic of Argentina*, Nos. 14 Civ. 7637, 14 Civ. 10064, 15 Civ. 2577, 15 Civ. 5190;
- *Claridae, et al. v. Republic of Argentina*, No. 14 Civ. 10201;
- *Angulo, et al. v. Republic of Argentina*, No. 15 Civ. 1470;
- *Lambertini, et al. v. Republic of Argentina*, No. 15 Civ. 1471;

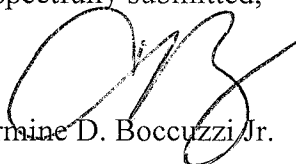
Hon. Thomas P. Griesa, p. 3

- *Lightwater Corporation Limited v. Republic of Argentina*, No. 14 Civ. 4092;
- *Andrarex, Ltd. v. Republic of Argentina*, No. 14 Civ. 9093; and
- *Attestor Master Value Fund LP v. Republic of Argentina*, No. 14 Civ. 5849.

Pursuant to Rule 1.F of the Court's individual practices, the parties represent that this is the first request for an extension of the briefing schedule for the Motions.

We respectfully request that the Court so-order the proposed schedule.

Respectfully submitted,



Carmine D. Boccuzzi Jr.

cc: Counsel of Record (by ECF)

SO ORDERED:

U.S.D.J.